

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<p>IN RE: Michael W. Dynda Debtor(s) Federal Home Loan Mortgage Corporation, as Trustee for the benefit of the Freddie Mac Seasoned Loans Structured Transaction Trust, Series 2019-1 Movant vs. Michael W. Dynda Debtor(s) Kenneth E. West Trustee</p>	<p>CHAPTER 13 NO. 23-10507 PMM 11 U.S.C. Section 362</p>
---	--

**MOTION OF FEDERAL HOME LOAN MORTGAGE CORPORATION, AS TRUSTEE
FOR THE BENEFIT OF THE FREDDIE MAC SEASONED LOANS STRUCTURED
TRANSACTION TRUST, SERIES 2019-1
FOR RELIEF FROM THE AUTOMATIC STAY
UNDER SECTION 362**

1. Movant is Federal Home Loan Mortgage Corporation, as Trustee for the benefit of the Freddie Mac Seasoned Loans Structured Transaction Trust, Series 2019-1.
2. Debtor(s) is the owner(s) of the premises 1274 Skippack Pike, Blue Bell, PA 19422, hereinafter referred to as the mortgaged premises.
3. Movant is the holder of a mortgage, original principal amount of \$353,000.00 on the mortgaged premises that was executed on July 01, 2011. The mortgage has been assigned as follows:

Specialized Loan Servicing LLC to Federal Home Loan Mortgage Corporation, as Trustee for the benefit of the Freddie Mac Seasoned Loans Structured Transaction Trust, Series 2019-1 dated 1/15/2020; recorded 3/11/2020.
4. Kenneth E. West, is the Trustee appointed by the Court.
5. The commencement and/or continuation of the mortgage foreclosure proceedings by reason of non-payment of monthly mortgage payments were stayed by the filing of a Chapter 13 Petition in Bankruptcy by the Debtor(s).
6. Select Portfolio Servicing, Inc. services the loan on the property referenced in this Motion for Relief. In the event the automatic stay in this case is lifted/set aside, this case dismisses, and/or the debtor

obtains a discharge and a foreclosure action is commenced on the mortgaged property, the foreclosure will be conducted in the name of Federal Home Loan Mortgage Corporation, as Trustee for the benefit of the Freddie Mac Seasoned Loans Structured Transaction Trust, Series 2019-1. Said entity has the right to foreclose by virtue of being the owner and holder of the note. The promissory note is either made payable to said entity or has been duly endorsed.

7. As of January 31, 2024, the total payoff due on the mortgage is \$423,105.61.

8. Debtor(s) has failed to make the monthly post-petition mortgage payments in the amount of \$2,154.43 for the months of June 2023 through December 2023 and \$2,432.86 for January 2024 with less of a suspense balance of \$1,972.71 as of January 31, 2024.

9. In addition to the other amounts due to Movant reflected in this Motion, as of the date hereof, in connection with seeking the relief requested in this Motion, Movant has also incurred legal fees and legal costs. Movant reserves all rights to seek an award or allowance of such fees and expenses in accordance with applicable loan documents and related agreements, the Bankruptcy Code and otherwise applicable law.

10. The total amount necessary to reinstate the loan post-petition is \$15,541.16 as of January 31, 2024 (plus attorney's fees & costs).

11. Movant is entitled to relief from stay for cause.

12. This motion and the averments contained therein do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this motion, including fees and costs, due under the terms of the mortgage and applicable law.

WHEREFORE, Movant prays that an Order be entered modifying the Stay and permitting Movant to proceed with its mortgage foreclosure on the mortgaged premises, and to allow the Sheriff's Grantee to take any legal action to enforce its right to possession of the mortgage premises. Further, Movant prays that an Order be entered awarding Movant the costs of this suit, reasonable attorney's fees in accordance with the mortgage document and current law together with interest.

/s/ Michael P. Farrington, Esq.

Michael P. Farrington, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532
Phone: (215) 627-1322 Fax: (215) 627-7734
Attorneys for Movant/Applicant